

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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April 3, 2003

Bruce P. Beausejour, Esq.
Verizon
185 Franklin St., 13th Floor
Boston, MA 02110

RE: Performance Assurance Plan - Petition for Waiver
D.T.E. 03-38
Department's First Set of Information Requests

Dear Mr. Beausejour:

Attached please find the Department of Telecommunications and Energy's First Set of Information Requests to Verizon in the above-referenced proceeding. Please provide Verizon's responses by April 10, 2003. Contact me with any questions at 617-305-3613.

Sincerely,

Joan Foster Evans
Hearing Officer

cc. Mary Cottrell, Secretary
Michael Isenberg, Director, Telecommunications Division
Candice Allgaier, Telecommunications Division
Verizon email notification list
Department email CLEC list

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS
D.T.E. 03-38**

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to Verizon the following Information Requests.

I. Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to Verizon ("Verizon" or "Company") in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If the Company finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

7. If a question refers to an Information Request of another party, please provide that response and answer with information that supplements the previous response.
8. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit two (2) copies of the responses to Joan Foster Evans, Hearing Officer, and one copy each to Michael Isenberg and Candice Allgaier of the Telecommunications Division.

II. Information Requests

- DTE-VZ-1-1 Please refer to the Petition at 3, where Verizon states that “[a]t 1:00 AM EST Saturday, January 25, 2003, Verizon Network Management detected network flooding.” Is network flooding the primary characteristic of a “worm” attack? Does Verizon identify 1:00 AM EST of January 25, 2003 as the beginning of the attack against the Verizon network?
- DTE-VZ-1-2 Please refer to the Petition at 3-5, where Verizon identifies the steps taken in response to the Slammer Worm. Verizon states that it detected network flooding at 1:00 a.m. on January 25, 2003. Verizon further states that “[l]ater that morning” its connections to the Internet were becoming flooded, and that it subsequently determined that an external quarantine process was necessary. When on the morning of January 25, 2003 did Verizon observe that its connections to the Internet were becoming flooded? At what time did Verizon “bring down” or disable the wholesale interfaces?
- DTE-VZ-1-3 Please refer to the Petition at 4, where Verizon indicates that it disabled the wholesale interfaces. When Verizon brought down the wholesale interfaces, did this action stop or mitigate the effect of the Slammer Worm? What was the nature of the damage sustained by Verizon due to the effects of the Slammer Worm?
- DTE-VZ-1-4 Please refer to the Petition at 4, where Verizon indicates that it disabled the wholesale interfaces. Did Verizon disable any other web access besides the wholesale interfaces? What other actions did Verizon take in response to the Slammer Worm?
- DTE-VZ-1-5 Please refer to the Petition at 4, where Verizon states that it notified CLECs by email of “the event,” and then later issued an updated bulletin via the standard email notification. Provide a copy of each of these notifications. Describe Verizon’s “standard email notification” as it applies here.
- DTE-VZ-1-6 Please refer to the Petition at 4. In the early morning of January 25, 2003, were CLECs negatively affected by the network flooding experienced by Verizon before the wholesale interfaces became unavailable, or were CLECs affected only after the wholesale interfaces were disabled?
- DTE-VZ-1-7 When the wholesale interfaces became unavailable on the morning of January 25, 2003, what alternative methods existed for CLECs to

continue to communicate and do business with Verizon? Were these alternatives adequate for CLECs to continue to interface with Verizon to perform wholesale functions?

- DTE-VZ-1-8 Please refer to the Petition at 2, where Verizon states “[o]ne industry report estimates that ‘more than 90 percent of vulnerable computers [were infected] within 10 minutes.’” Explain what is meant by the phrase “vulnerable computers” in the above quote. What is the reason that ten percent of “vulnerable computers” were not susceptible, whether sooner or later? Did the source document identify functions and/or facilities that were resistant to the Slammer Worm? If yes, state what they were, and why they were not vulnerable. Provide a copy of the source document (“Week in Review: Worm’s Wrath” in CNET News.com of Feb. 7, 2003).
- DTE-VZ-1-9 Please refer to the Petition at 3, where Verizon states “[t]he Slammer Worm hit the national (and international) network quickly and without warning.” If there is warning of a “worm” attack, name the entities that would furnish Verizon with such a warning. Indicate whether the warnings estimate likelihood of attack, timing of its onset, and the potential severity. If Verizon has warning of a “worm” attack, outline the sequence of preparations that it follows in order to guard itself. Identify when, and by what means, did a warning about the Slammer Worm reach Verizon?
- DTE-VZ-1-10 Please provide a copy of Verizon’s policy for responding to computer virus/worm infections. Was this policy followed on January 25-26, 2003? If not, why not?
- DTE-VZ-1-11 Please provide a copy of Verizon’s computer security practices identifying the steps Verizon takes to protect itself from computer viruses/worms such as the Slammer Worm. Were these practices followed during the Slammer Worm incident? If not, why not?
- DTE-VZ-1-12 Please refer to the Petition at 3, where Verizon references the Network and Information Security teams. Describe the purpose and capabilities of Verizon Network and Information Security. Is it the group that has responsibility for dealing with problems like “worms”? If not, identify the group that has responsibility.
- DTE-VZ-1-13 Does Microsoft offer assistance in fighting “worms” to its customers? If the answer is yes, what kinds of assistance does Microsoft offer? Did Verizon, in dealing with the Slammer Worm, seek the assistance of Microsoft? If so, what type of assistance did Microsoft provide?

- DTE-VZ-1-14 Please refer to the Petition at 6-7, where Verizon discusses patch management. Provide a copy of Verizon's patch management policy. Are patches identified by level of importance or priority? Does Verizon's patch management policy address patches differently depending on the priority of a patch? Did Verizon follow its patch management policy with regard to patches that address the vulnerabilities exploited by the Slammer Worm? If not, why not?
- DTE-VZ-1-15 Refer to the Petition at 7-8, where Verizon references a patch or patches to "fend off the Slammer Worm." Verizon also states that Microsoft "had released security patches that addressed the specific vulnerability exploited by the Slammer Worm." When did Microsoft issue a patch for the Slammer Worm? Had Verizon received a specific patch or patches to protect against the effects of computer infections such as the Slammer Worm? When did Verizon become aware of this patch? How was Verizon notified of the patch? When did Verizon receive this patch? Was this patch installed, and to what extent was it installed, before January 25, 2003? Was this patch identified by a particular priority rating? If this patch was not installed before January 25, 2003, why was this particular patch not installed? If such a patch was utilized, how did it perform in the Verizon network?
- DTE-VZ-1-16 Please refer to the Petition at 8, where Verizon states that Microsoft has released new patches for the Slammer Worm. Has Verizon installed these new patches? If not, why has Verizon declined to install these particular patches?
- DTE-VZ-1-17 In response to its experience with the Slammer Worm, describe changes that Verizon has implemented, or considers implementing, in order to maintain network performance. Include changes in policies and procedures, as may be applicable.